

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

**VS.**

**LADONNA WIGGINS  
Defendant**

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§

**CASE NO. 4:21-cr-66**

**UNITED STATES' UNOPPOSED MOTION TO DISCLOSE DISCOVERABLE  
MATERIAL PURSUANT TO PROTECTIVE ORDER**

**COMES NOW** the United States of America through Jennifer B. Lowery, Acting United States Attorney, and Zahra Jivani Fenelon, Assistant United States Attorney, and requests the Court permit the disclosure of discoverable information pursuant to a protective order restricting disclosure.

**THE UNITED STATES REQUESTS** that the discoverable information being made available by the United States to the defendant and his attorney of record not be discussed or disclosed to anyone other than the named defendant and his attorney of record, or the staff of his attorney of record (including investigators, paralegals, expert witnesses, and other contracted agents associated with the attorney of record for purposes of defense preparation), except upon the express authorization of this Court and that under no circumstance should copies be provided to any defendant. Further, the United States requests this protective order also extend to any and all reports or other discoverable materials subsequently provided to the defense, except for the defendant's own statements.

**THE UNITED STATES FURTHER REQUESTS** the Court order that any attorney receiving the above-described items not disclose any information therein other than to prepare for trial and for the defense of his client.

**WHEREFORE**, the United States respectfully requests this Court permit disclosure consistent with the above requests.

Respectfully submitted,

JENNIFER B. LOWERY  
Acting United States Attorney

By: s/ Zahra Jivani Fenelon  
ZAHRA JIVANI FENELON  
Assistant United States Attorney  
(713) 567-9309

**Certificate of Service**

I hereby certify that the foregoing United States' Unopposed Motion to Disclose Discoverable Material Pursuant to Protective Order was filed on March 11, 2021 and a copy served electronically by the Court's CM/ECF System on all counsel of record.

s/ Zahra Jivani Fenelon  
Zahra Jivani Fenelon  
Assistant United States Attorney

**Certificate of Conference**

I certify that undersigned counsel for the United States has conferred with counsel for the defendant and that counsel is unopposed to this motion and proposed order granting disclosure consistent with this motion.

s/ Zahra Jivani Fenelon  
Zahra Jivani Fenelon  
Assistant United States Attorney